

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE METHYL TERTIARY BUTYL ETHER
PRODUCTS LIABILITY LITIGATION**

This document relates to:

City of New York v. Amerada Hess Corporation, et al.,
No. 04 Civ. 3417 (SAS)

Master File No. 1:00-1898
MDL 1358 (SAS)
M21-88

**DECLARATION OF LAUREN HANDEL
IN SUPPORT OF DEFENDANTS' JOINT MOTION *IN LIMINE* TO EXCLUDE
NON-EXPERT TESTIMONY OF KATHLEEN BURNS AND MARCEL MOREAU**

Lauren Handel, an attorney duly admitted to practice law in the State of New York and in this Court, hereby declares under penalty of perjury:

1. I am an attorney with the law firm of McDermott Will & Emery LLP, counsel for the Exxon Mobil Defendants in the above-captioned matter. I submit this Declaration in support of Defendants' Joint Motion *in Limine* to Exclude Non-Expert Testimony of Kathleen Burns and Marcel Moreau (hereinafter "Motion"). This Declaration authenticates the exhibits attached hereto and relied on in support of the Motion. In accordance with this Court's Individual Rules and Procedures, the exhibits have been excerpted to include only the relevant material. Copies of each of the exhibits appended hereto were made at my direction on or around May 11, 2009.

2. Attached hereto as Exhibit A is a true and correct copy of Excerpts from the Expert Report of Kathleen M. Burns, Ph.D. (Feb. 6, 2009).

3. Attached hereto as Exhibit B is a true and correct copy of Excerpts from the Expert Report of Marcel Moreau (Dec. 19, 2008).

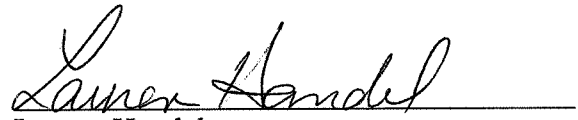
4. Attached hereto as Exhibit C is a true and correct copy of the Curriculum Vitae of Kathleen Burns, Ph.D.

5. Attached hereto as Exhibit D is a true and correct copy of the Curriculum Vitae of Marcel Moreau.

6. Attached hereto as Exhibit E is a true and correct copy of Excerpts from the Deposition of Kathleen Burns (Apr. 29, 2009).

Dated: New York, NY
May 11, 2009

Respectfully submitted,


Lauren Handel